January 24, 2017

Marlene H. Dortch, Secretary

Federal Communications Commission

445 12th Street SW

Washington, D.C. 20554

RE: **Notice of Ex Parte – Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CG Docket Nos. 10-51 & 03-123**

Dear Ms. Dortch:

On January 23, 2017, Michael Strecker, Vice President of Regulatory and Strategic Policy, Purple Communications Inc. ("Purple"); Lydia Yomogida, Sr. Manager Legal and Compliance Director, Purple (via phone); Darcy Howard, IT Project Manager / PMO Manager, Purple (via phone); Andrew Isar, Miller Isar, Inc., consultant for ASL Service Holdings, LLC dba GlobalVRS ("GlobalVRS"), (via phone); Jeff Rosen, General Counsel, Convo Communications, LLC. ("Convo") (via phone); Greg Hlibok, General Counsel, CSDVRS, LLC ("ZVRS") (via phone); Lydia Runnels, Vice President of Product Development and Engineering, ZVRS; (collectively "the Providers") met with the following staff of the Commission: Karen Peltz Strauss, Deputy Bureau Chief, Consumer and Government Affairs Bureau ("CGB"); Eliot Greenwald, Deputy Chief, Disability Rights Office ("DRO"); and Michael Scott, DRO attorney.

In the meeting, the Providers stressed the importance of a full implementation of several key capabilities for Telecommunications Relay Service User Registration Database (TRS-URD) pursuant to the directive adopted in the 2013 VRS Reform Order.[1] Among the key capabilities that need to be fully implemented in order to ensure positive consumer experience, operational efficiency and a level playing field for all VRS providers are: (1) a single unique ID; (2) ability to handle call backs for a 911 call from a non-registered or newly registered device; and (3) provision of real time updates to the iTRS numbering directory to ensure the continuity of VRS for consumers.

The Providers pointed out, as part of the goal outlined in the 2013 VRS Reform Order, the user registry would be created for assignment of a single unique ID for each individual user of TRS services. The purposes of this goal were to: 1) eliminate administrative burden on

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[1] *Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech to Speech Services for Individuals with Hearing and Speech Disabilities,* CG Docket Nos. 10-51 & 03-123, Report and Order and Further Notice of Proposed Rulemaking, 28 FCC Rcd 8618, ¶ 73 (2013 VRS Reform Order).

consumers and providers, 2) protect consumer privacy by reducing repeated identity verifications, 3) increase portability between providers (and thus, market competition), and 4) provide the Commission with a single, non-duplicative, master database of the consumers being served by the TRS Fund.

The Providers also discussed the need to modify the current plans for the TRS-URD and iTRS numbering directory to enable real-time data synchronization between both database for a call routing process. Failure to modify the plans could result in possible scenarios where either newly registered users or unregistered devices will be unable to receive call backs from their VRS provider if their 911 call disconnects during the call.

In addition, the Providers emphasized that due to the current design schema regarding updates to the TRS-URD and the iTRS numbering directory, there could be a delay ranging from hours to several days where newly registered users, or ported users, would not be able to place and/or receive calls.

Lastly, the Providers reminded the FCC of its obligation to notify VRS users that they not be eligible to use the service if they are not registered for the URD. The Providers stressed that it is imperative that this notification occur before the URD window opens and is communicated in ASL.

The Providers disseminated the attached white paper detailing key concerns and issues at the meeting.

Sincerely,

/s/

Greg Hlibok
General Counsel

cc: Karen Peltz Strauss
        Eliot Greenwald
        Michael Scott

Attachment